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6 Attorneys for Chapter 11 Trustee,  
RICHARD A. MARSHACK  
7

8 UNITED STATES BANKRUPTCY COURT  
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA

10 In re

11 THE LITIGATION PRACTICE GROUP P.C.,  
12

13 Debtor.  
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Case No. 8:23-bk-10571-SC

Chapter 11

TRUSTEE’S NOTICE OF MOTION AND  
MOTION FOR ORDER DETERMINING  
AMOUNT OF SECURED CLAIMS, IF  
ANY, HELD BY:

(1) EVERYDAY FUNDING GROUP,  
(2) GREEN FUND,  
(3) WORLD GLOBAL FUND,  
(4) MCA CAPITAL HOLDINGS,  
(5) STRATCAP MANAGEMENT,  
(6) COBALT,  
(7) CLOUDFUND,  
(8) BMF,  
(9) KEVLAR, AND  
(10) FRANKLIN CAPITAL  
MEMORANDUM OF POINTS AND  
AUTHORITIES; DECLARATION OF  
D. EDWARD HAYS IN SUPPORT

Hearing Date

Date: February 28, 2024

Time: 1:30 p.m.

Ctrm: 5C - ViaZoom<sup>1</sup>

Place: 411 West Fourth Street  
Santa Ana, CA 92701

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28 <sup>1</sup> ZoomGov: Video and audio connection information for each hearing will be provided on Judge Clarkson's  
publicly posted hearing calendar, which may be viewed online at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>, and then selecting “Judge Clarkson” from the tab on the left-hand side of the page.

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY COURT  
2 JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; ALL INTERESTED PARTIES  
3 INCLUDING RESPONDENTS: (1) EVERYDAY FUNDING GROUP; (2) GREEN FUND;  
4 (3) WORLD GLOBAL FUND; (4) MCA CAPITAL HOLDINGS; (5) STRATCAP  
5 MANAGEMENT; (6) COBALT; (7) CLOUDFUND; (8) BMF; (9) KEVLAR; AND  
6 (10) FRANKLIN CAPITAL:

7 PLEASE TAKE NOTICE that a hearing will be held on February 28, 2024, at 1:30 p.m., in  
8 the United States Bankruptcy Court, Central District of California, Via ZoomGov, with regard to the  
9 Motion filed Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) for the  
10 bankruptcy estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor” / “LPG”), to determine  
11 the amount of the secured claims, if any, held by the following respondents: (1) Everyday Funding  
12 Group; (2) Green Fund; (3) World Global Fund; (4) MCA Capital Holdings; (5) Stratcap  
13 Management; (6) Cobalt; (7) Cloudfund; (8) BMF; (9) Kevlar; and (10) Franklin Capital  
14 (collectively, “Respondents”). As set forth below, Trustee believes that each of these potential  
15 secured claims (which arise from UCC-1 financing statements that appear of record and haven’t  
16 been terminated) should be valued at zero. To the extent that the Court determines any of the secured  
17 claims to be zero, Trustee requests authorization to file termination statements. Under FRBP 3012, a  
18 bankruptcy court may determine the amount of a secured claim under 11 U.S.C. § 506(a) on motion  
19 of any party in interest and on notice to the holder of the secured claim and any other entity as the  
20 court may direct.

21 The Motion is based upon this Notice, the attached memorandum of points and authorities,  
22 the attached Declaration of D. Edward Hays, the pleadings and files in the Debtor’s bankruptcy case,  
23 and upon such further oral and documentary evidence as may be presented to the Court. **If you do**  
24 **not oppose the motion described above, then you need take no further action.**

25 PLEASE TAKE FURTHER NOTICE that any opposition or other responsive pleadings must  
26 be in the form as required by Rule 9013-1(f) of the Local Bankruptcy Rules (“LBR”) and filed with  
27 the Clerk of the above-entitled Court no later than 14 days prior to the hearing with a copy  
28

1 served on Marshack Hays Wood LLP to the attention of D. Edward Hays and Alina N. Mamlyuk at  
2 the address indicated above and served on the Office of the United States Trustee, 411 W. Fourth  
3 Street, Suite 7160, Santa Ana, CA 92701. Failure to timely respond may be deemed as acceptance of  
4 the proposed Motion. *See* LBR 9013-1(h).

5  
6 DATED: February 7, 2024

MARSHACK HAYS WOOD LLP

7  
8 By: /s/ D. Edward Hays

D. EDWARD HAYS

9 ALINA N. MAMLYUK

Attorneys for Chapter 11 Trustee,

10 RICHARD A. MARSHACK  
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**I. Summary of Argument**

Under FRBP 3012, a bankruptcy court may determine the amount of a secured claim upon request of any party in interest and on notice to the holder of the secured claim and any other entity as the court may direct. The Respondents are potential secured creditors because they have filed financing statements with the California Secretary of State which have not been terminated. After reviewing Debtor's books and records, the Trustee does not believe that any amounts remain owing to any of the Respondents.<sup>2</sup> To the extent that the Court determines that the secured claim of any Respondent is zero, the Trustee further seeks authorization to file a termination statement.

**II. Pertinent Factual Background**

**A. Debtor's Business, Bankruptcy Filing, and Trustee's Investigation of Potential Secured Creditors**

Pre-petition, Debtor was a law firm that provided consumer debt resolution services and creditor litigation services to clients, servicing more than 50,000 customers across the United States. In 2022, Debtor's annual revenue exceeded \$150 million.

On March 20, 2023, Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana Division ("Bankruptcy Case"). Prior to bankruptcy, Debtor fraudulently transferred substantially all its assets and clients. As of the petition date, Debtor had virtually no assets or clients.

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<sup>2</sup> By this Motion, the Trustee does not seek a determination of the validity, priority, or extent of any lien held by any Respondent. Such a proceeding would require an adversary proceeding under FRBP 7001. Instead, this Motion only seeks a determination of the amount secured by any of the financing statements that have been filed but not terminated. FRBP 3012(a) provides that:

"(a) Determination of Amount of Claim. On request by a party in interest and after notice—to the holder of the claim and any other entity the court designates—and a hearing, the court may determine:

(1) the amount of a secured claim under § 506(a) of the Code; or  
(2) the amount of a claim entitled to priority under § 507 of the Code."

FRBP 3012(a).

1 On March 30, 2023, as Dk. No. 21, the Office of the United States Trustee (“UST”) filed a  
2 motion to dismiss or convert the Bankruptcy Case under 11 U.S.C. § 1112(b) for failure to comply  
3 with its guidelines and requirements for a chapter 11 case. No opposition to the motion was filed.

4 On May 3, 2023, a hearing was held on the motion to dismiss or convert. At the hearing, the  
5 Court directed the UST to appoint a Chapter 11 Trustee. Richard A. Marshack was appointed the  
6 Chapter 11 trustee of the Debtor’s Estate. *See*, Dk. No. 65.

7 At the time of filing of its bankruptcy case, LPG did not disclose all its secured creditors.  
8 On December 18, 2023, the Court entered an order specifically asking the Trustee to provide a  
9 summary of his findings regarding pertinent information related to LPG’s secured creditors and any  
10 other parties asserting an interest in property of the estate. *See*, Dk. No. 774.

11 On January 19, 2024, the Trustee filed the required status report as Dk. No. 858 (“Security  
12 Status Report”) which outlines that he (1) completed an investigation to determine which entities  
13 had filed UCC-1 Financing Statements; (2) attempted to correspond with all lienholders;  
14 (3) obtained 2004 subpoenas for documents; and (4) analyzed LPG bank statements and  
15 agreements. A true and correct copy of the Security Status Report is attached as Exhibit “11.”

16 In his Security Status Report, the Trustee specifically identified the ten Respondents whose  
17 secured claims are the subject of this Motion. Based on his investigation and efforts to contact the  
18 Respondents, Trustee has concluded that none of these lienholders having pending financing  
19 statements are owed money by the Debtor. Exhibit “A” in the Security Status Report details the  
20 Trustee’s investigative efforts as it relates to each of the Respondents.

21 As disclosed in his Security Status Report, the Trustee is now filing this Motion pursuant to  
22 FRBP 3012 seeking a determination as to the amount the secured claim held by each Respondent,  
23 which the Trustee believes to be valued at zero.

## 24 **B. Alleged Secured Creditors**

25 Since his appointment, the Trustee and his agents have scoured available records to identify  
26 which secured creditors may exist. As stated in the Security Status Report (Dk. No. 858), the  
27 following 10 Respondents have filed UCC-1 Secured Financing Statements but appear (1) to have no  
28 supporting documentation to support any secured claim, (2) to have already agreed to release the

lien, or (3) to have failed to respond to the Trustee's requests for information.

<b>Alleged Secured Creditor</b>	<b>Current Status of Communication</b>	<b>Trustee's Request</b>
1. Everyday Funding Group. Financing statement attached as Exhibit "1."	Unresponsive	Determine valuation at zero; authorize filing of UCC-3 termination statement
2. Green Fund NY Financing statement attached as Exhibit "2."	Unresponsive	Determine valuation at zero; authorize filing of UCC-3 termination statement
3. World Global Fund LLC Financing statement attached as Exhibit "3."	Unresponsive	Determine valuation at zero; authorize filing of UCC-3 termination statement
4. MCA Capital Holdings LLC Financing statement attached as Exhibit "4."	Unresponsive	Determine valuation at zero; authorize filing of UCC-3 termination statement
5. Stratcap Management LLC Financing statement attached as Exhibit "5."	Unresponsive	Determine valuation at zero; authorize filing of UCC-3 termination statement
6. Cobalt Funding Solutions, LLC Financing statement attached as Exhibit "6."	Cobalt's attorney has advised the Trustee that the UCC lien will be terminated and that no debt is owed. This lien is separate from the financing statement that Cobalt assigned to Bae and which Bae assigned to Azzure.	Determine valuation at zero; authorize filing of UCC-3 termination statement (but not the financing statement assigned by Cobalt to Bae to Azzure).
7. Cloudfund Financing statement attached as Exhibit "7."	Lien to be released	Determine valuation at zero; authorize filing of UCC-3 termination statement
8. BMF Advance Financing statement attached as Exhibit "8."	BMF's attorney has advised the Trustee that BMF has no objection to filing of termination statement and has agreed that there is no lien	Determine valuation at zero; authorize filing of UCC-3 termination statement
9. Kevlar Financing statement attached as Exhibit "9."	Lien to be released	Determine valuation at zero; authorize filing of UCC-3 termination statement
10. Franklin Capital Management, LLC; also Franklin Capital Group LLC Financing statements attached as Exhibit "10."	Liens to be released	Determine valuation at zero; authorize filing of UCC-3 termination statements

**III. Legal Argument**

**A. Rule 3012 of the Federal Rules of Bankruptcy Procedure Permits This Court to Determine the Amount of a Secured Claim by Motion**

Rule 3012 authorizes a bankruptcy court to determine the amount of a secured claim under § 506(a) or the amount of claim entitled to priority under § 507 of Title 11 of the United States Code. Fed. R. Bank. P. 3012(a). Subsection (b) of Rule 3012 allows such a determination to be made on request by a party in interest, after notice and a hearing by motion. There is no requirement that a determination of the amount of a secured claim can be made only after a claim has been filed, as there is with respect to a priority claim. See, 9 Collier on Bankruptcy P 3012.03 (16th 2018). Plainly put, any party in interest, including a Chapter 11 trustee, may use Rule 3012 as a tool to request a valuation of a secured claim even when no proof of claim has been filed.

Here, the Trustee is a real party in interest requesting valuation of any claim owed pursuant to the filed UCC filings. The Trustee has expended considerable effort to correspond with the Respondents to determine if any are in fact holders of claims secured by Debtor's assets. Several of the Respondents simply did not respond or, in their response, agreed that their lien should be terminated. To obtain a formal adjudication regarding the amount of any claims secured by these filed financing statements, the Trustee files this Motion. For the reasons set forth below, Trustee believes that the amount secured by any of the subject financing statements should be determined to be zero.

**B. Zero Valuation**

Based on his investigation, including efforts to contact Respondents, the Trustee has concluded that the amount owed to each Respondent is zero. The following five Respondents failed to respond to the Trustee: Everyday Funding Group; Green Fund; World Global Fund; MCA Capital Holdings; and Stratcap Management.

Further, based on the responses received from the following five Respondents, the Trustee believes that they concede that they are not owed anything secured by the financing statements that remain of record: Cobalt; Cloudfund; BMF; Kevlar; and Franklin Capital.

1 On January 2, 2024, the Court entered an Order establishing bar dates for filing proofs of  
2 claim (“Order Establishing Bar Date”). The Order Establishing Bar Date specifically required all  
3 creditors holding secured creditors holding claims against Debtor that arose prior to bankruptcy file a  
4 claim by February 23, 2024. To date, none of the Respondents have filed secured claims. If any of  
5 the Respondents fail to file claims by the bar date (which will occur prior to the hearing on this  
6 Motion), there will be additional good cause to determine that the amount of any such secured claim  
7 be valued at zero.

8 Should any of the Respondents respond to this Motion with evidence supporting any alleged  
9 secured claim, the Trustee reserves the right to withdraw this Motion or file a reply requesting a  
10 different valuation.

11 **C. Good Cause Exists to Authorize Trustee to File UCC-3 Termination Statements**  
12 **for any Secured Claim Valued at Zero**

13 California law authorizes the secured party to file a termination statement if there is no  
14 obligation secured by the collateral covered by the financing statement. Cal. Comm. Code § 9513(c):

15 (c) In cases not governed by subdivision (a), within 20 days after a secured  
16 party receives a signed demand from a debtor, the secured party shall cause the  
17 secured party of record for a financing statement to send to the debtor a  
18 termination statement for the financing statement or file the termination statement  
19 in the filing office if any of the following conditions is satisfied:

20 (1) Except in the case of a financing statement covering accounts  
21 or chattel paper that has been sold or goods that are the subject of a  
22 consignment, there is no obligation secured by the collateral covered by  
23 the financing statement and no commitment to make an advance, incur an  
24 obligation, or otherwise give value.

25 (2) The financing statement covers accounts or chattel paper that  
26 has been sold but as to which the account debtor or other person obligated  
27 has discharged its obligation.  
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1 This Motion serves as Trustee's demand that each of the Respondents file a termination  
2 statement. To the extent that the Court determines any secured claim to be zero, Trustee requests  
3 authority to file a termination statement to remove the cloud of any potential lien from property of  
4 this bankruptcy estate.

5 **IV. Conclusion**

6 For the foregoing reasons, Trustee requests that the Court enter an order granting this Motion  
7 and:

- 8 1) Determining that the amount of each Respondents' secured claim is \$0.00;
- 9 2) Authorizing the Trustee to file UCC-3 termination statements for each financing  
10 statement for which the amount of the secured claim has been determined to be zero;  
11 and
- 12 3) Awarding such further relief as the Court deems just and proper.

13  
14 DATED: February 7, 2024

MARSHACK HAYS WOOD LLP

15  
16 By: /s/ D. Edward Hays  
D. EDWARD HAYS  
ALINA N. MAMLYUK  
17 Attorneys for Chapter 11 Trustee,  
18 RICHARD A. MARSHACK  
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**Declaration of D. Edward Hays**

I, D. EDWARD HAYS, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. The facts set forth below are true of my personal knowledge.
4. I am an attorney at law duly admitted to practice before this Court and all courts of the State of California.
5. I am a partner in the law firm of Marshack Hays Wood LLP, general counsel for Richard A. Marshack, in his capacity as Chapter 11 Trustee ("Trustee") for the bankruptcy estate ("Estate") of The Litigation Practice Group P.C. ("Debtor").
6. I reviewed the docket in this case prior to execution of this Declaration to refresh my memory as to the dates on which particular documents were filed.
7. I make this Declaration in support of Trustee's Motion Under Rule 3012 To Determine the Amount of Secured Claim ("Motion").
8. Prior to bankruptcy, Debtor was a law firm that provided consumer debt resolution services allegedly servicing more than 50,000 customers across the United States. According to Debtor's Statement of Financial Affairs, its annual revenue for 2022 exceeded \$150 million.
9. Debtor, in filing its bankruptcy petition, did not provide a complete list of secured creditors.
10. Trustee and his counsel have undertaken an investigation regarding identification of potential secured creditors including by obtaining a list of filed financing statements that had not been terminated as of the petition date.
11. Trustee through his retained professionals attempted to identify any debt owed to these potential secured creditors.
12. After completing his investigation, Trustee has concluded that the following ten entities holding financing statements were not owed any money by Debtor: (1) Everyday Funding Group; (2) Green Fund; (3) World Global Fund; (4) MCA Capital Holdings; (5) Stratcap

1 Management; (6) Cobalt; (7) Cloudfund; (8) BMF; (9) Kevlar; and (10) Franklin Capital  
2 (collectively, “Respondents”).

3 13. True and correct copies of each of the subject financing statements is attached as  
4 Exhibits “1” through “10” with the exhibit number corresponding to the number next to each  
5 Respondent in the previous paragraph (i.e. the Cobalt financing statement would be Exhibit “6.”).

6 14. Through counsel, Trustee attempted to communicate with each Respondent to  
7 determine if any contended they were still owed money secured by these liens.

8 15. Some of the Respondents were completely unresponsive to Trustee’s efforts to  
9 determine if they were still owed money.

10 16. To date, none of the Respondents have filed a proof of claim asserting a secured  
11 claim against the Estate.

12 17. The bar date for the filing of any prepetition claim, including a secured claim, is  
13 February 23, 2024 (several days prior to the hearing on this Motion).

14 18. Trustee previously filed a status report of potential secured claims. A true and correct  
15 copy of this status report filed as Dk. No. 858 is attached as Exhibit “11.”

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
17 February 7, 2024.

18 /s/ D. Edward Hays

19 D. EDWARD HAYS  
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**EXHIBIT 1**



U210052109216



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210052109216

Date Filed: 6/2/2021

B0399-2084 06/02/2021 4:12 PM Received by California Secretary of State

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH ST STE 100 TUSTIN, CA 92780

Secured Party Information:

Secured Party Name	Mailing Address
EVERYDAY FUNDING GROUP	132 32ND STREET BROOKLYN, NY 11232

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

Merchant hereby sells, assigns and transfers to EFG all of Merchant's future accounts, contract rights and other obligations arising from or relating to the payment of monies from Merchant's customers and/or other third party payers for the payment of Merchant's sale of goods or services until the full amount (\$374,750.00) has been remitted from the Merchant to EFG.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:

80789829

**EXHIBIT 2**



U210057632826



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210057632826

Date Filed: 6/17/2021

B0404-3189 06/17/2021 12:13 PM Received by California Secretary of State

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Debtor Information:

Debtor Name	Mailing Address
BAT INC.	1351 CALLE AVANZADO STE 2 SAN CLEMENTE, CA 92673
VULCAN CONSULTING GROUP LLC	5 CASTILLO DEL MAR CAPISTRANO BEACH, CA 92624
THE LITIGATION PRACTICE GROUP PC	17542 E 17TH STREET TUSTIN, CA 92673
TONY MAURICE DIAB	8 ALMANZORA NEWPORT COAST, CA 92657

Secured Party Information:

Secured Party Name	Mailing Address
GREEN FUND NY	276 5TH AVE RM 704 BROOKLYN, NY 10001

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents chattel paper, licenses, leases and general intangibles, whether now owned acquired or arising, and all of debtor's books and records relating to any of the foregoing.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:

81046359

**EXHIBIT 3**





U210059750525



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210059750525

Date Filed: 6/24/2021

B0405-7321 06/24/2021 11:52 AM Received by California Secretary of State

Submitter Information:

Contact Name	CORPORATION SERVICE COMPANY
Organization Name	CORPORATION SERVICE COMPANY
Phone Number	18008585294
Email Address	SPRFiling@cscglobal.com
Address	801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH ST STE 100 TUSTIN, CA 92780
B.A.T. INC	17542 17TH ST STE 100 TUSTIN, CA 92780
VULCAN CONSULTING GROUP LLC	17542 17TH ST STE 100 TUSTIN, CA 92780
DANIEL STEPHEN MARCH	20160 NOB HILL DR YORBA LINDA, CA 92886
TONY DIAB	17542 17TH ST STE 100 TUSTIN, CA 92780
BRIAN REALE	17542 17TH ST STE 100 TUSTIN, CA 92780

Secured Party Information:

Secured Party Name	Mailing Address
WORLD GLOBAL FUND LLC	5309 13TH AVE BROOKLYN, NY 11220

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents, chattel paper, licenses, leases and general intangibles, whether now owned acquired or arising, and all of the debtor's books and records relating to any of the foregoing.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:

2133 40032



U210060298730



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210060298730

Date Filed: 6/28/2021

B0407-1496 06/28/2021 5:37 AM Received by California Secretary of State

Submitter Information:

Contact Name	CORPORATION SERVICE COMPANY
Organization Name	CORPORATION SERVICE COMPANY
Phone Number	18008585294
Email Address	SPRFiling@cscglobal.com
Address	801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703

Amendment Action Information:

Initial Financing Statement File Number	U210059750525
Date Filed	06/24/2021
Amendment Action	Debtor Amendment
Debtor Action	Delete Debtor

Delete Debtor:

Debtor Name	Mailing Address
BRIAN REALE	17542 17TH ST STE 100 TUSTIN, CA 92780

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name	WORLD GLOBAL FUND LLC
--------------------------------	-----------------------

Optional Filer Reference Information:

Debtor:BRIAN REALE 2134 58297

**EXHIBIT 4**



U210075685527



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210075685527

Date Filed: 8/16/2021

B0421-3591 08/16/2021 7:26 AM Received by California Secretary of State

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH ST STE 100 TUSTIN, CA 92780

Secured Party Information:

Secured Party Name	Mailing Address
MCA CAPITAL HOLDINGS LLC	802 AVENUE U BROOKLYN, NY 11223

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

Merchant hereby sells, assigns and transfers to MCA all of Merchant's future accounts, contract rights and other obligations arising from or relating to the payment of monies from Merchant's customers and/or other third party payers for the payment of Merchant's sale of goods or services until the full amount (\$374,750.00) has been remitted from the Merchant to MCA.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:

81977418

**EXHIBIT 5**



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File No.: U220237657634

Date Filed: 10/21/2022

Submitter Information: Contact Name Organization Name Phone Number Email Address Address					
Stratcap Management LLC  stratcapmgmt@gmail.com 2030 MAIN STREET SUITE 1300 IRVINE, CA 92614					
Debtor Information:					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Debtor Name</th> <th style="text-align: center;">Mailing Address</th> </tr> <tr> <td style="padding: 5px;">The Litigation Practice Group P.C.</td> <td style="padding: 5px;">17542 E 17th Street Suite 100 Tustin, CA 92780</td> </tr> </table>	Debtor Name	Mailing Address	The Litigation Practice Group P.C.	17542 E 17th Street Suite 100 Tustin, CA 92780	
Debtor Name	Mailing Address				
The Litigation Practice Group P.C.	17542 E 17th Street Suite 100 Tustin, CA 92780				
Secured Party Information:					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Secured Party Name</th> <th style="text-align: center;">Mailing Address</th> </tr> <tr> <td style="padding: 5px;">Stratcap Management LLC</td> <td style="padding: 5px;">2030 Main Street Suite 1300 Irvine, CA 92614</td> </tr> </table>	Secured Party Name	Mailing Address	Stratcap Management LLC	2030 Main Street Suite 1300 Irvine, CA 92614	
Secured Party Name	Mailing Address				
Stratcap Management LLC	2030 Main Street Suite 1300 Irvine, CA 92614				
Indicate how documentation of Collateral is provided: Attached in a File					
Upload PDF as Collateral: Complete_with_DocuSign_20221004_(BUY)_STRATC.pdf					
Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable					
Select an alternate Financing Statement type: Not Applicable					
Select an additional alternate Financing Statement type: Not Applicable					
Select an alternative Debtor/Secured Party designation for this Financing Statement: Seller/Buyer					
Optional Filer Reference Information:					
Miscellaneous Information:					
Search to Reflect: <input checked="" type="checkbox"/> Order a Search to Reflect Debtor Name					
The Litigation Practice Group P.C.					

B1192-5120 10/21/2022 3:58 PM Received by California Secretary of State

EXHIBITS TO UCC FILE NO. U220237657634 INTENTIONALLY REMOVED

**EXHIBIT 6**





U210062497027



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210062497027

Date Filed: 7/6/2021

B0408-7049 07/06/2021 10:16 AM Received by California Secretary of State

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH STREET STE 100 TUSTIN, CA 92780
VULCAN CONSULTING GROUP LLC	17542 17TH STREET STE 100 TUSTIN, CA 92780
BAT INC	17542 17TH STREET STE 100 TUSTIN, CA 92780
THE LITIGATION PRACTICE GROUP PC	17542 17TH STREET STE 100 TUSTIN, CA 92780
VULCAN CONSULTING	17542 17TH STREET STE 100 TUSTIN, CA 92780
COAST PROCESSING.COM D/B/A COAST PROCESSING	17542 17TH STREET STE 100 TUSTIN, CA 92780
DANIEL STEPHEN MARCH	20160 NOB HILL DRIVE YORBA LINDA, CA 92886
TONY M DIAB	25961 GLEN CANYON DR LAGUNA HILLS, CA 92653
TONY M DIAB	8 ALMANZORA NEWPORT COAST, CA 92657

Secured Party Information:

Secured Party Name	Mailing Address
C T CORPORATION SYSTEM, AS REPRESENTATIVE	330 N BRAND BLVD SUITE 700; ATTN: SPRS GLENDALE, CA 91203

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All personal property of every kind and nature, including, without limitation, all accounts, contract rights, rights to the payment of money, insurance claims and proceeds, chattel paper, electric chattel paper, documents, instruments, securities and other investment property, deposit accounts, supporting obligations of every nature, and general intangibles, including without limitation, customer lists, and all books and records related thereto, and all recorded data of any kind and any nature, regardless of the medium of recording; together with, to the extent not listed above as the original collateral, all substitutions and replacements for and products of any of the foregoing property, and together with proceeds of any and all of the foregoing property.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable
Select an alternate Financing Statement type:
Select an additional alternate Financing Statement type:
Select an alternative Debtor/Secured Party designation for this Financing Statement:
Optional Filer Reference Information: 81323933

B0408-7050 07/06/2021 10:16 AM Received by California Secretary of State

**EXHIBIT 7**



U210052792122



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210052792122

Date Filed: 6/4/2021

B0399-6391 06/04/2021 2:31 PM Received by California Secretary of State

Submitter Information:

Contact Name	CORPORATION SERVICE COMPANY
Organization Name	CORPORATION SERVICE COMPANY
Phone Number	18008585294
Email Address	SPRFiling@cscglobal.com
Address	801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH STREET STE 100 TUSTIN, CA 92780
VULCAN CONSULTING GROUP LLC	17542 17TH STREET STE 100 TUSTIN, CA 92780
VULCAN CONSULTING	17542 17TH STREET STE 100 TUSTIN, CA 92780
BAT INC	17542 17TH STREET STE 100 TUSTIN, CA 92780
COAST PROCESSING.COM	17542 17TH STREET STE 100 TUSTIN, CA 92780
COAST PROCESSING	17542 17TH STREET STE 100 TUSTIN, CA 92780

Secured Party Information:

Secured Party Name	Mailing Address
CORPORATION SERVICE COMPANY, AS REPRESENTATIVE	P.O. BOX 2576, UCCSPREP@CSCINFO.COM SPRINGFIELD, IL 62708

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All accounts, including without limitation, all deposit accounts, accounts-receivable, and other receivables, chattel paper, documents, equipment, general intangibles, instruments, and inventory, as those terms are defined by Article 9 of the Uniform Commercial Code (the "UCC"), now or hereafter owned or acquired by Seller; and all Seller's proceeds, as such term is defined by Article 9 of the UCC. NOTICE PURSUANT TO AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO FURTHER ENCUMBER THE COLLATERAL DESCRIBED HEREIN, THE FURTHER ENCUMBERING OF WHICH MAY CONSTITUTE THE TORTIOUS INTERFERENCE WITH THE SECURED PARTY'S RIGHT BY SUCH ENCUMBRANCER IN THE EVENT THAT ANY ENTITY IS GRANTED A SECURITY INTEREST IN DEBTOR'S ACCOUNTS, CHATTEL PAPER OR GENERAL INTANGIBLES CONTRARY TO THE ABOVE, THE SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH ENTITY.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:  
Optional Filer Reference 2122 93605

B0399-6392 06/04/2021 2:31 PM Received by California Secretary of State

**EXHIBIT 8**



U210090322021



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210090322021

Date Filed: 10/4/2021

B0434-5680 10/04/2021 9:34 AM Received by California Secretary of State

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	1351 CALLE AVANZADO STE4 SAN CLEMNTE, CA 92673
BAT INC.	1351 CALLE AVANZADO STE4 SAN CLEMNTE, CA 92673
VULCAN CONSULTING GROUP LLC	8 ALMANZORA NEWPROT COAST, CA 92657
DANIEL STEPHAN MARCH	20160 NOB HILL YORBA LINDA, CA 92886
TONY M DIAB	25961 GLEN CANYON DR LAGUNA HILLS, CA 92653

Secured Party Information:

Secured Party Name	Mailing Address
BMF ADVANCE	1022 AVE M BROOKLYN, NY 11230

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All Assets now owned or hereafter acquired and wherever located, including but not limited to, the following subcategories of assets: a. Accounts, including but not limited to, credit card receivables; b. Chattel Paper; c. Inventory; d. Equipment; e. Instruments, including but not limited to, Promissory Notes; f. Investment Property; g. Documents; h. Deposit Accounts; i. Letter of Credits Rights; j. General Intangibles; k. Supporting Obligations; and l. Proceeds and Products of the foregoing. NOTICE PURSUANT TO AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO FURTHER ENCUMBER THE COLLATERAL DESCRIBED HEREIN, THE FURTHER ENCUMBERING OF WHICH MAY CONSTITUTE THE TORTIOUS INTERFERENCE WITH THE SECURED PARTY'S RIGHT BY SUCH ENCUMBRANCE IN THE EVENT THAT ANY ENTITY IS GRANTED A SECURITY INTEREST IN DEBTOR'S ACCOUNTS, CHATTEL PAPER OR GENERAL INTANGIBLES CONTRARY TO THE ABOVE, THE SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH ENTITY.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Select an additional alternate Financing Statement type:

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Optional Filer Reference Information:

82763197

B0434-5681 10/04/2021 9:34 AM Received by California Secretary of State



**EXHIBIT 9**



U230006246724



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File No.: U230006246724

Date Filed: 1/26/2023

B1444-8931 01/26/2023 9:40 AM Received by California Secretary of State

Submitter Information:	
Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071
Debtor Information:	
Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	17542 17TH STREET STE 100 TUSTIN, CA 92780
Secured Party Information:	
Secured Party Name	Mailing Address
C T CORPORATION SYSTEM, AS REPRESENTATIVE	330 N BRAND BLVD SUITE 700; ATTN: SPRS GLENDALE, CA 91203
Indicate how documentation of Collateral is provided: Entered as Text	
Description: All personal property of every kind and nature, including, without limitation, all accounts, contract rights, rights to the payment of money, insurance claims and proceeds, chattel paper, electric chattel paper, documents, instruments, securities and other investment property, deposit accounts, supporting obligations of every nature, and general intangibles, including without limitation, customer lists, and all books and records related thereto, and all recorded data of any kind and any nature, regardless of the medium of recording; together with, to the extent not listed above as the original collateral, all substitutions and replacements for and products of any of the foregoing property, and together with proceeds of any and all of the foregoing property.	
Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable	
Select an alternate Financing Statement type:	
Select an additional alternate Financing Statement type:	
Select an alternative Debtor/Secured Party designation for this Financing Statement:	
Optional Filer Reference Information: 91055620	

**EXHIBIT 10**



U210096955939



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210096955939

Date Filed: 10/26/2021

B0441-9769 10/26/2021 11:05 AM Received by California Secretary of State

Submitter Information:

Contact Name	CORPORATION SERVICE COMPANY
Organization Name	CORPORATION SERVICE COMPANY
Phone Number	18008585294
Email Address	SPRFiling@cscglobal.com
Address	801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	906 GLENNEYRE ST. LAGUNA BEACH, CA 92651

Secured Party Information:

Secured Party Name	Mailing Address
FRANKLIN CAPITAL GROUP, LLC	32300 NORTHWESTERN HWY. FARMINGTON HILLS, MI 48334

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All personal property of the Debtor including, without limitation, all of the following property Debtor now or later owns or has an interest in, wherever located:

- a) all of the Debtor's Accounts, Chattel Paper, Deposit Accounts, Documents, Equipment, Farm Products, Fixtures, Goods, General Intangibles, Instruments, Inventory, Investment Property, Letter of Credit Rights (whether or not given in support of Accounts), Software, as defined below (words and phrases used herein and not otherwise specifically defined herein shall have the respective meanings assigned to such terms as such terms are defined in the Uniform Commercial Code of the State of Michigan, as in effect from time to time (the "UCC"), present and future, including but not limited to any items listed on Schedule 1 attached hereto, if any;
- b) all present and future insurance claims relating to any of the above;
- c) all Goods, Instruments (including, without limit, promissory notes), Documents (including, without limit, negotiable Documents), policies and certificates of insurance, Deposit Accounts, and money or other property (except real property which is not a fixture) which are now or later in possession of Secured Party, or as to which Secured Party now or later controls possession by documents or otherwise;
- d) all present and future books, records, and data of the Debtor relating to any of the above; and
- e) all present and future accessions, additions and attachments to, proceeds, parts, products, replacement, substitutions, Supporting Obligations and rights arising out of, any of the above, including but not limited to stock rights, subscription rights, interest, distributions, dividends, stock dividends, stock splits, or liquidating dividends, renewals, all cash and Accounts, insurance policies and proceeds, arising from the sale, rent, lease, casualty loss or other disposition of any of the above and cash and other property which were proceeds of any of the above and are recovered by a bankruptcy trustee or otherwise as a preferential transfer by the Debtor.

In this description of Collateral, a reference to a type of collateral shall not be limited by a separate reference to a more specific or narrower type of that collateral.

UNDER AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO SELL, ASSIGN, PLEDGE OR OTHERWISE ENCUMBER THE COLLATERAL DESCRIBED IN THIS FINANCING STATEMENT, WHICH INCLUDES ALL AFTER ACQUIRED PROPERTY, INCLUDING ALL OF DEBTOR'S ACCOUNTS, FUTURE ACCOUNTS, CONTRACT RIGHTS, FUTURE SALES, RECEIPTS AND OTHER OBLIGATIONS. THE SALE, ASSIGNMENT, PLEDGE OR ENCUMBERING OF ANY SUCH COLLATERAL WOULD CONSTITUTE TORTIOUS INTERFERENCE WITH SECURED PARTY'S

CONTRACTUAL RELATIONSHIP WITH DEBTOR. IN THE EVENT THAT ANY THIRD PARTY PURCHASES, TAKES AN ASSIGNMENT OR PLEDGE OF, AND/OR IS GRANTED A SECURITY INTEREST IN ANY OF THE ASSETS DESCRIBED IN THIS FINANCING STATMENT, SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH THIRD PARTY. DEBTOR HAS ALSO AGREED TO HOLD IN TRUST FOR SECURED PARTY ALL PAYMENTS RECEIVED IN CONNECTION WITH SECURED PARTY'S COLLATERAL, AND FROM THE SALE, LEASE OR OTHER DISPOSITION OF SUCH COLLATERAL ANY ATTEMPT BY A THIRD PARTY TO EXERCISE DOMINION OR CONTROL OVER THE COLLATERAL DESCRIBED IN THIS FINANCING STATEMENT WOULD CONSTITUTE CONVERSION OF SECURED PARTY'S COLLATERAL.
Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable
Select an alternate Financing Statement type:
Select an additional alternate Financing Statement type:
Select an alternative Debtor/Secured Party designation for this Financing Statement:
Optional Filer Reference Information: :NJR/ASW (15492-1) 2207 46239

B0441-9770 10/26/2021 11:05 AM Received by California Secretary of State



U210096958844



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT (UCC 1)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210096958844

Date Filed: 10/26/2021

B0441-9805 10/26/2021 11:10 AM Received by California Secretary of State

Submitter Information:

Contact Name	CORPORATION SERVICE COMPANY
Organization Name	CORPORATION SERVICE COMPANY
Phone Number	18008585294
Email Address	SPRFiling@cscglobal.com
Address	801 ADLAI STEVENSON DR SPRINGFIELD, IL 62703

Debtor Information:

Debtor Name	Mailing Address
THE LITIGATION PRACTICE GROUP PC	906 GLENNEYRE ST. LAGUNA BEACH, CA 92651

Secured Party Information:

Secured Party Name	Mailing Address
FRANKLIN CAPITAL MANAGEMENT, LLC	32300 NORTHWESTERN HWY. FARMINGTON HILLS, MI 48334

Indicate how documentation of Collateral is provided:

Entered as Text

Description:

All personal property of the Debtor including, without limitation, all of the following property Debtor now or later owns or has an interest in, wherever located:

- a) all of the Debtor's Accounts, Chattel Paper, Deposit Accounts, Documents, Equipment, Farm Products, Fixtures, Goods, General Intangibles, Instruments, Inventory, Investment Property, Letter of Credit Rights (whether or not given in support of Accounts), Software, as defined below (words and phrases used herein and not otherwise specifically defined herein shall have the respective meanings assigned to such terms as such terms are defined in the Uniform Commercial Code of the State of Michigan, as in effect from time to time (the "UCC"), present and future, including but not limited to any items listed on Schedule 1 attached hereto, if any;
- b) all present and future insurance claims relating to any of the above;
- c) all Goods, Instruments (including, without limit, promissory notes), Documents (including, without limit, negotiable Documents), policies and certificates of insurance, Deposit Accounts, and money or other property (except real property which is not a fixture) which are now or later in possession of Secured Party, or as to which Secured Party now or later controls possession by documents or otherwise;
- d) all present and future books, records, and data of the Debtor relating to any of the above; and
- e) all present and future accessions, additions and attachments to, proceeds, parts, products, replacement, substitutions, Supporting Obligations and rights arising out of, any of the above, including but not limited to stock rights, subscription rights, interest, distributions, dividends, stock dividends, stock splits, or liquidating dividends, renewals, all cash and Accounts, insurance policies and proceeds, arising from the sale, rent, lease, casualty loss or other disposition of any of the above and cash and other property which were proceeds of any of the above and are recovered by a bankruptcy trustee or otherwise as a preferential transfer by the Debtor.

In this description of Collateral, a reference to a type of collateral shall not be limited by a separate reference to a more specific or narrower type of that collateral.

UNDER AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO SELL, ASSIGN, PLEDGE OR OTHERWISE ENCUMBER THE COLLATERAL DESCRIBED IN THIS FINANCING STATEMENT, WHICH INCLUDES ALL AFTER ACQUIRED PROPERTY, INCLUDING ALL OF DEBTOR'S ACCOUNTS, FUTURE ACCOUNTS, CONTRACT RIGHTS, FUTURE SALES, RECEIPTS AND OTHER OBLIGATIONS. THE SALE, ASSIGNMENT, PLEDGE OR ENCUMBERING OF ANY SUCH COLLATERAL WOULD CONSTITUTE TORTIOUS INTERFERENCE WITH SECURED PARTY'S

CONTRACTUAL RELATIONSHIP WITH DEBTOR. IN THE EVENT THAT ANY THIRD PARTY PURCHASES, TAKES AN ASSIGNMENT OR PLEDGE OF, AND/OR IS GRANTED A SECURITY INTEREST IN ANY OF THE ASSETS DESCRIBED IN THIS FINANCING STATMENT, SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH THIRD PARTY. DEBTOR HAS ALSO AGREED TO HOLD IN TRUST FOR SECURED PARTY ALL PAYMENTS RECEIVED IN CONNECTION WITH SECURED PARTY'S COLLATERAL, AND FROM THE SALE, LEASE OR OTHER DISPOSITION OF SUCH COLLATERAL ANY ATTEMPT BY A THIRD PARTY TO EXERCISE DOMINION OR CONTROL OVER THE COLLATERAL DESCRIBED IN THIS FINANCING STATEMENT WOULD CONSTITUTE CONVERSION OF SECURED PARTY'S COLLATERAL.
Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative: Not Applicable
Select an alternate Financing Statement type:
Select an additional alternate Financing Statement type:
Select an alternative Debtor/Secured Party designation for this Financing Statement:
Optional Filer Reference Information: :NJR/ASW (15492-1) 2207 46540

B0441-9806 10/26/2021 11:10 AM Received by California Secretary of State

**EXHIBIT 11**



1 D. EDWARD HAYS, #162507

ehays@marshackhays.com

2 LAILA MASUD, #311731

lmasud@marshackhays.com

3 MARSHACK HAYS LLP

870 Roosevelt

4 Irvine, California 92620

Telephone: (949) 333-7777

5 Facsimile: (949) 333-7778

6 General Counsel for Chapter 11 Trustee

RICHARD A. MARSHACK

7

Christopher B. Ghio (State Bar No. 259094)

8 Christopher Celentino (State Bar No. 131688)

9 Yosina M. Lissebeck (State Bar No. 201654)

**DINSMORE & SHOHL LLP**

10 655 West Broadway, Suite 800

San Diego, CA 92101

11 Telephone: 619.400.0500

Facsimile: 619.400.0501

12 Christopher.ghio@dinsmore.com

13 Christopher.celentino@dinsmore.com

Yosina.Lissebeck@dinsmore.com

14

Special Counsel to Richard A. Marshack,

15 Chapter 11 Trustee for the Bankruptcy Estate

of The Litigation Practice Group P.C.

16

17 UNITED STATES BANKRUPTCY COURT

18 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

19 In re

20 THE LITIGATION PRACTICE GROUP P.C.,

21 Debtor.

22

23

24

25

26

Case No. 8:23-bk-10571-SC

Chapter 11

CHAPTER 11 TRUSTEE'S STATUS  
REPORT

Date: February 7, 2024

Time: 1:30 p.m.

Ctrm: Courtroom 5C – Virtual<sup>1</sup>

411 West Fourth Street

Santa Ana, CA 92701

27 <sup>1</sup> This hearing date is designated Zoom Only, pursuant to Judge Clarkson's self-calendaring  
procedures. Video and audio connection information for each hearing will be provided on Judge  
28 Clarkson's publicly posted hearing calendar, which may be viewed online at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>.

1 TO THE HONORABLE JUDGE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
2 COURT JUDGE AND ALL INTERESTED PARTIES:

3 Richard A. Marshack, in his capacity as the Chapter 11 Trustee ("Trustee") of the bankruptcy  
4 estate ("Estate") of The Litigation Practice Group P.C. ("Debtor/LPG"), respectfully submits this  
5 status report ("Status Report") in compliance with the Court's Order entered on December 18, 2023  
6 [Docket #774]. In that Order, the Court specifically asked for information related to secured parties  
7 and other parties asserting an interest in property of the estate. A summary of those matters is  
8 provided herein, with the specific information related to the secured creditors attached as Exhibit A.

9 1. **Secured Parties:** Upon filing its bankruptcy case, LPG did not disclose all of its  
10 secured creditors. Trustee did the required investigation to determine those entities that had recorded  
11 UCC1 Secured Financing Statements. Trustee and his counsel attempted to correspond with all  
12 lienholders, obtained 2004 subpoenas for documents, and analyzed LPG bank records and  
13 agreements. Trustee and his counsel organized the secured creditors into two categories: 1) those  
14 that had documents to support its claims and filed liens, but who Trustee still believed had issues  
15 related to those documents and liens; and 2) those that did not have documents to support their claim  
16 and filed liens.

17 An adversary proceeding for declaratory relief to determine validity, priority, and extent of  
18 the various competing liens, along with other claims for relief related to those entities will be  
19 brought as to those in category 1 against the following: Bridge Funding (Fundura); Azzure; MNS  
20 Funding; Marich Bein (reservation of rights); OHP (consolidate with existing adversary proceeding);  
21 PECC (reservation of rights); ProofPositive; Venture Partners; and the MCDVF various entities).  
22 Trustee intends to file this adversary proceeding prior to the February 7, 2024, status conference.

23 As to the category 2 parties, Trustee found no evidence that claims existed at the time the  
24 bankruptcy was filed (notwithstanding that UCC-1 financing statements remained of record). Trustee  
25 requested that these potential secured parties file termination statements. Some agreed, some  
26 requested that Trustee file termination statements, and some did not respond. Thus, Trustee sent  
27 these parties a letter required under Uniform Commercial Code Section 9-315 stating that Trustee  
28 would terminate the lien if they failed to respond. Trustee will now be filing a Motion pursuant Rule

3012 of the Federal Rules of Bankruptcy Procedure, seeking an order valuing these claims at zero, and authorizing Trustee to file the termination statements (because you can't have a lien without a claim). The category 2 parties are: Everyday Funding Group; Green Fund; World Global Fund; MCA Capital Holdings; Stratcap Management; Cobalt (said they would release copy requested); Cloudfund (released); BMF (agreed that there is no lien; requested termination statement); Kevlar (released); and Franklin Capital (released).

The remaining secured party, City Capital, has agreed that it has no lien and is entering into a settlement agreement with Trustee. Trustee will draft the settlement and a 9019 Motion to approve that agreement.

Attached as Exhibit A is the information requested by the Court in its Order related to these entities.

2. **Marketing/Affiliate Entities:**

The Court also asked for information related to any party claiming an interest in property of the estate. As the Court knows, Trustee is pursuing adversary complaints against the Marketing/Affiliate entities. Trustee has identified over 300 of these entities. Some of these entities claim that they purchased "receivables," which would be an interest in property of the estate. Trustee disputes the legality of these transactions and disputes that these parties purchased receivables. The Court can review the complaint styled *Richard A. Marshack, Chapter 11 Trustee, vs. JGW Solutions, LLC*; Adversary Case 8:23-ap-01148-SC, filed on December 18, 2023, for a review of the claims for relief being pursued.

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1 Trustee is investigating these entities, reviewing bank information, agreements, and upon  
2 having the necessary support for the allegations, Trustee will file adversary proceedings against  
3 them. These entities do not appear to assert that they are secured parties.

4  
5 DATED: January 19, 2024

DINSMORE & SHOHL LLP

6 Special Counsel for Chapter 11 Trustee  
7 RICHARD A. MARSHACK

8 AND

9 MARSHACK HAYS LLP

10 By: /s/ D. Edward Hays

11 D. EDWARD HAYS

12 LAILA MASUD

General Counsel for Chapter 11 Trustee

13 RICHARD A. MARSHACK  
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EXHIBIT “A”

Case 8:23-bk-10571-SC Doc 858 Filed 01/19/24 Entered 01/19/24 16:50:55 Desc  
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Creditor with Filed UCC in Order of Filing	Filing Date of Purported Security Interest	Status for Report to Court	POC Info	Attorney Name	Notes	State of Formation and Registered Agent	Additional Address information
Fundura	5/19/2021	Litigation - Complaint for declaratory relief & additional claims to be filed week of January 22nd	POC No. 335 for \$2.3M+	Berkovitch & Bouskila PLLC c/o Ariel Bouskila 1545 Route 202, Suite 101 Pomona, NY 10970	UCC is listed as released; right to file UCC was waived. Settlement is possible	New York - Domestic Limited Liability Company Bridge Funding Cap LLC No Registered Agent but NY SOS to mail copy of any process to: Bridge Funding Cap LLC 538 13th Avenue, Suite 324 Brooklyn, New York 11219	Fundura Capital Group 80 Broad Street Suite 3303 New York, NY 10004
Azzure	5/28/2021	Assigned UCC filed on 5/28/21; settlement failed. Litigation - Complaint for declaratory relief & additional claims to be filed week of January 22nd	POC No. 127 for \$5M+	Bryan Cave Leighton Paisner LLP c/o Sharon Weiss 120 Broadway Ste 300 Santa Monica CA 90401	Settlement is possible	New York - Domestic Limited Liability Company Azzure Capital LLC <u>Registered Agent:</u> The LLC 1820 Avenue M, Suite #695 Brooklyn, New York 11230	
MNS Funding	5/28/2021	MH to contact; Complaint for declaratory relief & additional claims to be filed week of January 22nd	POC No. 1060 for \$15.3M	MNS FUNDING LLC c/o Paul R Shankman, Of Counsel Fortis LLP-650 Town Center Dr., Ste 1530 Costa Mesa CA 92626	Settlement is possible - Trustee does not believe secured claim is supported by documents.	New York - Domestic Limited Liability Company MNS Funding LLC <u>Registered Agent:</u> File Right LLC 5314 16th Avenue, Suite 139 Brooklyn, New York 11204	MNS Funding LLC 3611 15th Avenue Brooklyn, NY 11218
Everyday Funding Group	6/2/2021	Requested release per 9-315 via 12/20 letter. Post office has not confirmed certified mail delivery. Requesting USPS follow up. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement.	None Filed. Everyday filed suit in August 2021 seeking to recover \$189K under a MCA agreement. Lawsuit was discontinued a few days later. Trustee does not believe anything is owed.			New York - Domestic Limited Liability Company Everyday Funding Group LLC <u>Registered Agent:</u> The LLC 1308 Kings Highway Brooklyn, New York 11229	Everyday Funding Group 132 32nd Street Brooklyn, NY 11232

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Marich Bein lien position assigned by Clearfund Solutions LLC	6/17/2021	Clearfund assigned UCC filed on 6/17/21 to Marich Bein. Marich Bein is a defendant in Adversary Pro. No. 8:23-ap-010146 filed on May 25, 2023; they will be dismissed from that and another case filed directly against them for various claims for relief; they will also be part of the Complaint for declaratory relief & additional claims to be filed week of January 22nd.	None Filed. Marich purchased accounts from LPG and claims to have paid more than \$10M for those files. So their claim is really only against the files they purchased and not for a specific dollar amount.			New York - Domestic Limited Liability Company Marich Bein LLC <u>Registered Agent:</u> The LLC 99 Wall Street, 3618 New York, New York 10005	
Green Fund	6/17/2021	No response from letters and service of Rule 2004 motion. Sending letter requesting release per 9-315 on 1/8/24. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement.	None Filed. Trustee has no related documents.			New York - Domestic Limited Liability Company Green Fund of Manhattan LLC <u>Registered Agent:</u> BBF Partners LLC 461 Van Brunt St, Ste. 14A Brooklyn, New York 11231	
World Global Fund LLC	6/24/2021	Trustee found no evidence of a claim being owed; Requested release per 9-315 via 12/20 letter. Certified mail delivered. Time to release expires in mid January. No response received. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement.	None Filed. Release letter received and no response within statutory time. Lien can be released.			New York - Domestic Limited Liability Company World Global Fund LLC <u>Registered Agent:</u> File Right LLC 5314 16 Avenue, Suite 139 Brooklyn, New York 11204	World Global Fund LLC c/o File Right LLC, Agent for Service of Process 5314 16 Avenue, Suite 139 Brooklyn, NY 11204  World Global Fund LLC 5309 13th Avenue Brooklyn, NY 11220 SPRFiling@cscglob al.com
Cobalt Funding Solutions LLC	7/6/2021	Attorney has advised UCC will be released and no debt is owed. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement.	None Filed. Per attorney, nothing is owed.		Not Yet Released	New York - Domestic Limited Liability Company Cobalt Funding Solutions LLC <u>Registered Agent:</u> The LLC 99 Wall Street, 3618 New York, New York 10005	

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MCA Capital Holdings LLC	8/16/2021	Trustee found no evidence of claim being owed. No response from letters and service of Rule 2004 motion. Sending letter requesting release per 9-315 on 1/8/24. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement	None Filed. Trustee has a document appearing to be a 6/22/21 MCA agreement allegedly purchasing \$3.2M+ for \$4.8M+. No other info.			New York - Domestic Limited Liability Company MCA Capital Holdings LLC <u>Registered Agent:</u> The LLC 254 32nd Street, Bldg. 2 C303 Brooklyn, New York 11232	MCA Capital Holdings LLC 802 Avenue U Brooklyn, NY 11223
BMF Advance LLC	10/4/2021	Counsel has advised that they have no objection to termination statement being filed by Trustee. State court lawsuit dismissed with prejudice. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement	None Filed. State court lawsuit dismissed with prejudice on 4/26/23. No debt is owed.			New York - Domestic Limited Liability Company BMF Advance LLC No RA listed on NY Division of Corporations site but site reflects Secretary of State would use address below for process: BMF Advance LLC 1820 Ave M, Ste 125 Brooklyn, New York 11230	BMF Advance 1022 Avenue M Brooklyn, NY 11230
Diverse Capital LLC	9/15/21 and 12/1/2021	MH to contact; Litigation - Complaint for declaratory relief & additional claims to be filed week of January 22nd	None Filed. Diverse sued the debtor in 2021 to collect on \$2.4M in outstanding MCA agreements. Trustee believes this is roughly the purported current balance.			Connecticut - Domestic Limited Liability Company Diverse Capital, LLC <u>Registered Agent:</u> Registered Agent Solutions, Inc. 2138 Silas Deane Hwy, Ste 101 Rocky Hill, Connecticut 06067	Diverse Capital LLC 750 Main Street, Suite 906 Hartford, CT 06103  Diverse Capital LLC 243 Tresser Blvd., 17th Floor Stamford, CT 06901-3436
Stratcap Management LLC	#####	Trustee found no evidence of claim being owed. Requested release per 9-315 via 12/20 letter. Letter to office address returned. Email and mail to other addresses not returned. Letter resent via email and certified mail on 1/4. A Motion under 3012 will be filed requesting authority to value claim at 0 and to file termination statement	None Filed. AR agreements were transferred to Stratcap for no consideration. Trustee does not believe that anything is owed.			California - Domestic Limited Liability Company Stratcap Management LLC <u>Registered Agent:</u> Wes Thomas 2030 Main Street, Ste. 1300 Irvine, California 92614	



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OHP-CDR LP	1/25/2023	AP No. 8:23-ap-01098 filed on 9/11/23- will probably need to consolidate with other AP so that lien priority can be determined.	POC No. 44 for \$17M+	c/o Quinn Emanuel Urquhart & Sullivan LLC Attn: Jeremy Andersen 865 S. Figueroa Street, 10th Floor Los Angeles, CA 90017	Settlement is possible	Delaware - Limited Partnership OHP - CDR, LP <u>Registered Agent:</u> Capitol Services, Inc. 108 Lakeland Ave. Dover, Delaware 19901	
PECC Corp	2/2/2023	Adversary Proceeding will be filed asserting various claims for relief; additionally PECC will be part of the Complaint for declaratory relief & additional claims to be filed week of January 22nd	POC No. 740 for \$28M+	Wick Phillips Gould & Martin LLP c/o Rusty O'Kane 3131 McKinney Avenue, Suite 500 Dallas, TX 75204		Delaware - Corporation PECC CORP. <u>Registered Agent:</u> Registered Agent Solutions, Inc. 838 Walker Road Suite 21-2 Dover, Delaware 19904	
Proofpositive LLC	2/9/2023	Letter sent on 1/5/24 requesting release of UCC. Complaint for declaratory relief & additional claims to be filed week of January 22nd.	POC NO. 105 for \$15M+	(not official yet) Winthrop Golubow Hollander c/o Richard Golubow 1301 Dove St #500 Newport Beach, CA 92660	Recording of UCC is preference; if security interest is valid it is subject to prior liens and is likely unsecured.	Wyoming - Limited Liability Company ProofPositive LLC <u>Registered Agent:</u> Registered Agents, Inc. 30 N Gould St, Ste R Sheridan, Wyoming 82801	
MCDVI Fund 2 LLC etc.	2/10/2023	Lien is avoidable; MH handling; Complaint for declaratory relief & additional claims to be filed week of January 22nd.	State court complaint sought in excess of \$70M.	Winthrop Golubow Hollander c/o Richard Golubow 1301 Dove St #500 Newport Beach, CA 92660  and Cappello & Noel, LLP c/o A. Barry Cappello Cappello & Noel LLP 831 State Street Santa Barbara, California 93101-3227	Recording of UCC is preference; if security interest is valid it is subject to prior liens and is likely unsecured. MCDVI Fund 1 LLC; and Debt Validation Fund II, LLC are parties as well	Wyoming - Limited Liability Company; Wyoming - Limited Liability Company MC DVI Fund 1 LLC Registered Agent: Corporate Direct, Inc. 300 N Center Street, Unit 6 Casper, Wyoming 82601  Wyoming - Limited Liability Company Debt Validation Fund II, LLC Registered Agent: Cloud Peak Law, LLC 1095 Sugar View Dr, Ste. 500 Sheridan, Wyoming 82801  MC DVI Fund 2 LLC <u>Registered Agent:</u> Corporate Direct, Inc. 300 N Center Street, Unit 6 Casper, Wyoming 82601	

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Venture Partners LLC	3/9/2023	Letter sent on 1/5/24 requesting release of UCC. Complaint for declaratory relief & additional claims to be filed week of January 22nd.	POC NO. 105 for \$15M+	Winthrop Golubow Hollander c/o Richard Golubow 1301 Dove St #500 Newport Beach, CA 92660	Recording of UCC is preference; if security interest is valid it is subject to prior liens and is likely unsecured.	Wyoming - Limited Liability Company Venture Partners LLC <u>Registered Agent:</u> Cloud Peak Law, LLC 1095 Sugar View Dr, Ste 500 Sheridan, Wyoming 82801
City Capital NY LLC	3/16/2023	Release of Lien requested. Trustee is settling this action to provide unsecured claim; settlement and 9019 motion will be filed.	POC No. 89 for \$2.95M+	MauriceWutscher LLP c/o Alan C. Hochheiser 23611 Chagrin Blvd. Suite 207 Beachwood, OH 44122	Lien filed a week before the Petition Date and is subordinate to any security interests found valid.	New York - Domestic Limited Liability Company City Capital NY LLC <u>Registered Agent:</u> The LLC 164 20th Street 4E Brooklyn, New York 11232

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STATUS REPORT RE: SECURED PARTIES** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 18, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On January 19, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**  
THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST, SUITE 100  
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 19, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**  
**PRESIDING JUDGE'S COPY**  
HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE  
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C  
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 19, 2024  
Date

Pamela Kraus  
Printed Name

/s/ Pamela Kraus  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

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<b>US TRUSTEE</b>	United States Trustee (SA)	ustpreion16.sa.ecf@usdoj.gov
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<b>ATTORNEY FOR CREDITOR DEBT RELIEF GROUP, LLC</b>	Johnny White	JWhite@wrslawyers.com, jlee@wrslawyers.com

**2. SERVED BY UNITED STATES MAIL:** continued:

**INTERESTED / SECURED PARTY**

FUNDURA CAPITAL GROUP  
BERKOVITCH & BOUSKILA PLLC  
C/O ARIEL BOUSKILA  
1545 ROUTE 202, SUITE 101  
POMONA, NY 10970

**INTERESTED / SECURED PARTY**

FUNDURA CAPITAL GROUP  
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ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR LAW  
TO RECEIVE SERVICE OF PROCESS  
80 BROAD STREET, SUITE 3303  
NEW YORK, NY 10004

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1900 E GOLF ROAD, SUITE 550

**INTERESTED / SECURED PARTY**

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C/O BRIDGE FUNDING CAP LLC / ATTN: OFFICER, A  
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AGENT AUTHORIZED BY APPOINTMENT OR LAW TO  
RECEIVE SERVICE OF PROCESS  
538 13TH AVENUE, SUITE 324  
BROOKLYN, NEW YORK 11219

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AZZURE CAPITAL GROUP  
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THE LLC  
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BROOKLYN, NEW YORK 11230

**INTERESTED / SECURED PARTY**

MNS FUNDING LLC  
REGISTERED AGENT:  
FILE RIGHT LLC  
5314 16TH AVENUE, SUITE 139  
BROOKLYN, NEW YORK 11204

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SCHAUMBURG, IL 60173-5870

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BROOKLYN, NY 11218

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EVERYDAY FUNDING GROUP LLC  
REGISTERED AGENT:  
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1308 KINGS HIGHWAY  
BROOKLYN, NEW YORK 11229

**INTERESTED / SECURED PARTY**

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REGISTERED AGENT:  
FILE RIGHT LLC  
5314 16 AVENUE, SUITE 139  
BROOKLYN, NEW YORK 11204

**INTERESTED / SECURED PARTY**

COBALT FUNDING SOLUTIONS LLC  
REGISTERED AGENT:  
THE LLC  
99 WALL STREET, 3618  
NEW YORK, NEW YORK 10005

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MCA CAPITAL HOLDINGS LLC  
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BROOKLYN, NY 11230

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SERVICE OF PROCESS  
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**INTERESTED / SECURED PARTY**

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**INTERESTED / SECURED PARTY**

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CITY CAPITAL NY LLC  
REGISTERED AGENT:  
THE LLC  
164 20TH STREET 4E  
BROOKLYN, NEW YORK 11232

4881-8016-6559

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **TRUSTEE'S MOTION TO DETERMINE AMOUNT OF SECURED CLAIMS; DECLARATION IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 7, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **February 7, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST, SUITE 100  
TUSTIN, CA 92780-1984

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 7, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

**PRESIDING JUDGE'S COPY**

HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C  
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 7, 2024  
Date

Layla Buchanan  
Printed Name

/s/ Layla Buchanan  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

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<b>INTERESTED PARTY COURTESY NEF</b>	William McCormick	<a href="mailto:Bill.McCormick@ag.tn.gov">Bill.McCormick@ag.tn.gov</a>
<b>ATTORNEY FOR US TRUSTEE</b>	Kenneth Miskin	Kenneth.M.Miskin@usdoj.gov

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